

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Bankruptcy Case No. 19-20959 GLT
	:	
Glen H. Green and Esther L. Green,	:	Chapter 13
	:	
Debtors.	:	Document No.: _____
	:	
Glen H. Green and Esther L. Green,	:	
	:	
Movants,	:	
	:	
vs.	:	
	:	
RONDA J. WINNECOUR, CHAPTER	:	
13 TRUSTEE, UNITED STATES	:	
TRUSTEE'S OFFICE, FAYETTE	:	
COUNTY TAX CLAIM BUREAU,	:	
NEWELL BOROUGH, FRAZIER	:	
SCHOOL DISTRICT, AND MICHAEL	:	
A. CASSIN AND CHRISTINA M.	:	
CASSIN, BUYERS,	:	
	:	
Respondents.	:	

STATUS REPORT

As required by the Court's October 21, 2021 Text Order, the following is a status report on the Debtors' efforts to justify the sale price for the property located at 927 Newell Road, Fayette City, PA of \$135,000.00 offered by Debtors' daughter and son-in-law, Michael and Christina Cassin.

1. On November 24, 2021, Debtors filed an Appraisal and Affidavit of Appraiser at Document No. 107 and a Current Market Analysis and Affidavit of Realtor at Document No. 108.
2. This same date the Appraisal and Current Market Analysis were emailed to Counsel to the Chapter 13 Trustee, Owen Katz, for his review.
3. The appraisal listed a property value of \$128,000.00 subject to a realtor fee while the Current Market Analysis indicated a listing price between \$145,000.00 and \$159,000.00 also subject to a realtor commission.
4. Both the realtor and appraiser performed in house inspections of the property and both noted multiple deficiencies of the property, such that the property would likely be marketed "As Is" with limited financing options according to their affidavits.

5. After reviewing these reports, Attorney Katz, indicated by email, that the Trustee will not continue with the objection to the sale provided the plan remains a 100% distribution to unsecured creditors filing timely proofs of claim.
6. The proposed buyers are prepared to go forward with the purchase at \$135,000.00 with a closing within 30 days of Court approval.
7. The equity in Debtors residence will require their plan to remain a 100% distribution to the \$14,615.42 unsecured creditor pool regardless of whether the proposed sale closes or not.

WHEREFORE, Debtors, Glen H. Green and Esther L. Green, respectfully request this Court approve the sale of the subject real property as proposed in the Motion to Sell filed at Document No. 93.

Dated: December 8, 2021

ZEBLEY MEHALOV & WHITE, P.C.

/s/ Daniel R. White

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